

### **Remarks**

The present amendment is being submitted with a Request for Continued Examination. Applicant submits that this amendment responds to the issues that were set out in the Final Office Action mailed August 10, 2005. Applicants request that the Examiner enter this amendment in the present application and, after the amendment is entered, that the Examiner reconsider the application.

Claims 1, 47 and 82-112 are now pending. Claims 87, 94 and 98 are amended. Claims 85 and 86 have been allowed.

### **Amended Claims**

Claims 87, 94 and 98 have been amended to recite that the claimed platesetter system additionally comprises a printing plate positioning means. This recited feature brings a printing plate into a defined and centered position on a support bed of a platesetter before the printing plate is imaged. This amendment to claims 87, 94 and 98 is supported by the specification and claims as originally filed and does not introduce new matter into the application. Specifically, a printing plate positioning means is described in the specification at page 5 (the last paragraph) and at page 10 (second paragraph) bridging to page 11 (first full paragraph). A printing plate positioning means was also recited in originally filed claims 4 and 17-20.

### **Rejections under 35 U.S.C. § 103**

In the final office action mailed August 10, 2005, the Examiner opined that the claims were not patentable in two different rejections. In a first rejection, the Examiner rejected claims 1, 47, 87-89, 91-95 and 97-110 as being unpatentable over Landsman, US 4,764,815, in view of Bergling, US 4,015,702. In a second rejection, the Examiner rejected claim 82 as being unpatentable over Landsman in view of Bergling and further in view of Rinke et al., US 5,934,195.

Applicant respectfully traverses these two rejections and submits that neither the first nor second cited combination of references teach or suggest the now claimed invention. With respect to claims 82, 84, 87, 92-102, 111 and 112, there is no disclosure in any of the references that teach or suggest positioning a printing plate in a defined and centered position on a support bed of a platesetter. Both Landsman and Rinke et al. report that printing plates are placed, and moved, on platens. Further, Bergling reports that large metal ship plates are

always positioned along one side edge of a conveyor track. Applicant requests that the rejections of the claims based on the cited references be withdrawn.

Applicant further submits that the first and second combination of references cited by the Examiner are improper because there is no motivation to combine these references in the manner suggested by the Examiner. In short, the claimed invention provides a system and method for precisely imaging a printing plate. This process is very different than the method of conveying large metal plates to a welding station that is reported in Bergling. There is nothing in the record of the present application that establishes that a disclosure of conveying a large metal ship plate is within the field of the present inventor's endeavors or reasonably pertinent to the particular problem with which the inventor was concerned. Simply put, the Bergling reference is nonanalogous art and Applicant requests that the rejections of the claims that are based on the cited combination of references, that include the Bergling reference, be withdrawn.

Applicant submits that the amended claims are in condition for allowance and respectfully requests that a timely Notice of Allowance be issued in this application.

Respectfully submitted,



Attorney for Applicant(s)  
Registration No. 31,330

Mark G. Bocchetti/gms  
Rochester, NY 14650  
Telephone: 585-477-3395  
Facsimile: 585-477-4646

If the Examiner is unable to reach the Applicant(s) Attorney at the telephone number provided, the Examiner is requested to communicate with Eastman Kodak Company Patent Operations at (585) 477-4656.